

Exhibit A

HUE

STATE OF WISCONSIN

CIRCUIT COURT

JEFFERSON COUNTY

CARLOS ROMERO-ALICIA Process Server:

516 Collins Rd.
Jefferson, WI 53549

Time: 10:30 AM Date: 8/13
Address of serve: 211 Collins Rd

Plaintiff,

Person Served:

Susan M. Anderson

Case No:

13CV425

Case Code: 30703

v.

() Personal
() Substituted

() Substitute
(X) Corporate

Harold McConell
Plant Manager

JEFFERSON CO CIRCUIT COURT
AUTHENTICATED COPY
FILED

JUL 24 2013

BY: KS
NO. Clerk (RPF)

ANDERSON MACHINING SERVICE, INC.,
c/o Susan M. Anderson
Registered Agent
211 Collins Rd.
Jefferson, WI 53549

Defendants.

SUMMONS

THE STATE OF WISCONSIN

To each person named above as a defendant:

You are hereby notified that the plaintiff named above has filed a lawsuit or other legal action against you. The complaint, which is attached, states the nature and basis of the action.

Within forty-five (45) days of receiving this summons, you must respond with a written answer, as that term is used in chapter 802 of the Wisconsin Statutes, to the complaint. The Court may reject or disregard an answer that does not follow the requirements of the statutes. The answer must be sent or delivered to the Court, whose address is Jefferson County Clerk of Courts, 320 South Main Street, Jefferson, WI 53549 and plaintiffs' attorney, Douglas J. Phebus, whose address is, Arellano & Phebus, S.C., 1468 N. High Point Road, Suite 202, Middleton, Wisconsin, 53562. You may have an attorney help or represent you.

If you do not provide a proper answer within forty-five (45) days, the Court may grant judgment against you for the award of money or other legal action requested in the complaint,

and you may lose your right to object to anything that is or may be incorrect in the complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

If you require the assistance of auxiliary aids or services because of a disability, call 266-4678 (TTD 266-9138) and ask for the Court ADA Coordinator.

Dated this 23rd day of July, 2013.

ARELLANO & PHEBUS, S.C.



Attorney Douglas J. Phebus
State Bar No. 1029524

1468 N. High Point Road, Suite 202
Middleton, WI 53562
(608) 827-7680
(608) 827-7681 (facsimile)

STATE OF WISCONSIN

CIRCUIT COURT

JEFFERSON COUNTY

CARLOS ROMERO-ALICEA
516 Collins Rd.
Jefferson, WI 53549

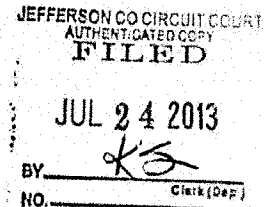
Plaintiff,

Case No: 13CV425
Case Code: 30703

v.

ANDERSON MACHINING SERVICE, INC.,
c/o Susan M. Anderson
Registered Agent
211 Collins Rd.
Jefferson, WI 53549

Defendants.



COMPLAINT

NOW COMES Plaintiff, Carlos Romero-Alicea, by and through his attorneys, Arellano & Phebus S.C. by Douglas J. Phebus, and for his complaint against Defendant states as follows:

1. Plaintiff, Carlos Romero-Alicea, resides in Wisconsin at 516 Collins Rd., Jefferson, WI 53549.
2. Defendant, Anderson Machining Service, Inc. is a Wisconsin corporation whose principal place of business is located at 211 Collins Rd, Jefferson, WI 53549.
3. Plaintiff was hired to work for defendant on September 6, 2011. Plaintiff is of Mexican ancestry and the Hispanic race.
4. Shortly after being hired by defendant, plaintiff was the victim of both physical and verbal attacks by Caucasian co-workers. He was treated differently than the Caucasians who

worked at Anderson Machining Service, Inc. in that they were not subjected to these types of attacks.

5. In February, 2012 Russell Haas, a Caucasian co-employee pushed the plaintiff at work. Plaintiff complained to management who failed to take any corrective action.

6. In March 2012, Plaintiff was disrespected by a Caucasian co-worker, Mike Hill, and the two argued as a result. Management decided to suspend plaintiff for one day and took no action against the Caucasian co-worker for the same conduct.

7. On July 24, 2013, defendant terminated plaintiff's employment because of an interaction with a co-worker which defendant refused to identify both at the time of termination and during the EEOC investigation. Defendant never told plaintiff what he had specifically done to warrant termination.

8. Plaintiff felt belittled while working for the defendant and was treated poorly by co-workers. He was called derogatory names such as "Sparky." The Caucasian co-workers were not subjected to the same treatment.

9. Management knew of the disparate treatment and took no corrective action.

10. The termination of plaintiff's employment was based upon his national origin and race.

11. Plaintiff brings this action pursuant to 42 U.S.C § 1981, et seq., and 42 U.S.C. § 2000-3 (Title VII) alleging that he was discriminated against in the terms and condition of his employment, retaliated against for complaining of racial harassment, and terminated based on his national origin and race.

12. Plaintiff seeks compensation and relief in the form of compensatory damages, wage loss and benefits, front pay, punitive damages, attorney's fees and costs as prescribed by 42 U.S.C. § 1981, et seq., and 42 U.S.C. § 2000-3 (Title VII).

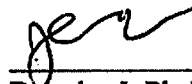
WHEREFORE, Plaintiff demands judgment against Defendant as follows:

- A. Compensatory damages including but not limited to lost wages and benefits;
- B. Compensatory damages for the emotional pain, suffering, inconvenience, and mental anguish, and
- C. Liquidated damages, punitive damages, future damages, front pay, costs, and attorney's fees.

PLAINTFF REQUESTS A TRIAL BY JURY OF SIX PERSONS.

Dated: 7/23/13

ARELLANO & PHEBUS, S.C.
Attorneys for Defendants



Douglas J. Phebus
State Bar No. 1029524
1468 N. High Point Road, Suite 202
Middleton, WI 53568
PH: (608) 827-7680
FAX: (608) 827-7681